

# Industrial Pretreatment Quarterly

Published for Industrial Dischargers by the King County Industrial Waste Program (KCIW)



**King County**

Wastewater Treatment Division  
**Industrial Waste Program**

Volume XXXIV Issue 4 Dec. '05 - Jan. '06

## Mission Statement

*The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage system. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.*

## Industrial Waste Advisory Committee

Kevin Burrell,  
Environmental Coalition of South  
Seattle (ECOSS)  
Ken Gross, GM Nameplate  
Sandy Hallberg, Asko Processing  
Donna Hoskins, Berlex Laboratories  
Bill Hughes, Skills, Inc.  
Larry Petersen, Mikron Industries  
Al Rainsberger, Todd Pacific  
Steve Skodje, Cargill, Inc.  
Heather Trim, People for Puget Sound  
Doris Turner, Boeing Commercial  
Airplane Group - Renton  
Chris VanHoof, City of Kent  
Scott Woerman, North Creek Analytical

► **Special 4-page  
insert - EPA  
"Streamlining" Rule**

## Congratulations to 04-05 Commitment-to-Compliance award winners!

Each year the King County Industrial Waste Program (KCIW) recognizes significant industrial users of the sewer system that have helped to protect human health and the environment by maintaining an excellent record of compliance with rules and regulations for the previous calendar year.

In 2005 B.S.B. Diversified Co., Smith Fabrication Inc. and Vectra Fitness Inc., all of Kent, and the Boeing Electronics Center of Renton won KCIW's 2004 Commitment-to-Compliance Award, presented in 2005. The award honors companies for discharging wastewater every month for five years with no violations. Companies can win the Commitment-to-Compliance Award only once every five years. The three Kent companies are the first two-time winners since the award was first presented. (See photos, pages two and eight.)

More than 70 other companies also received awards for their excellent record of compliance in 2004 with discharge regulations.



Left to right: Vectra Manufacturing Manager Steve Gabrielsen, President Doug MacLean, and KCIW's Program Manager Elsie Hulsizer and Compliance Investigator Dave Haberman.

Vectra Fitness has manufactured multigyms for both home and light-commercial use since 1987.

## Inside this Issue

- Commitment-to-Compliance Award winners
- KCIW News: Workshop; WTD honored; IWAC to meet; Meet IWAC member; Free emergency poster
- Industrial Pretreatment Tips – Hazardous waste manifests
- EPA "Streamlining" Rule
- 2006 Industrial Waste fees
- Companies win environmental awards
- IWAC meeting highlights
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## KCIW News Briefs

### King County Wastewater Treatment Division honored

The King County Wastewater Treatment Division has been selected to receive one of only seven national awards in 2005 for excellence in management from the National Association of Clean Water Agencies, (NACWA). The division was chosen for its significant efforts during the past several years. Also contributing to the division's selection were KCIW (with recognition given to its outreach to dentists and specific industrial dischargers) and the division's public education activities. *Read more about the division's award at <http://dnr.metrokc.gov/dnrp/press/2005/1201wtdaward.htm> on the Internet.*

### Upcoming IWAC meetings

Industrial Waste Advisory Committee (IWAC) meetings for 2006 are February 1, May 3 and November 1. The meeting site at 130 Nickerson St. is wheelchair accessible. People who have needs or disabilities for which arrangements must be made in advance should contact KCIW at 206-263-3000; use the Washington Relay Service at 711 or e-mail: [kristin.painter@metrokc.gov](mailto:kristin.painter@metrokc.gov). (See November IWAC meeting highlights, page 1.)

### Meet an IWAC member

KCIW is presenting a series of profiles of its Industrial Waste Advisory Committee (IWAC) members.



Doris Turner

An environmental engineer who has worked at The Boeing Company for 13.5 years, Doris is responsible for industrial wastewater at Boeing's Renton, North Boeing Field, Plant 2 and stormwater at the Renton and Longacres sites. Doris says, "being an IWAC member has given me a better perspective of the county concerns, operations and processes. It is an opportunity to learn about other industry and county processes that could benefit Boeing's operations as well as share experiences and perceptions as a regulated business. The IWAC members are a great bunch of people to network with and learn from – plus there are very informative meetings and every tour has been invaluable." (See page 6 for more on IWAC.)

### Commitment-to-Compliance award winners

(continued from page 1)



Left to right: Dave Haberman, KCIW compliance investigator, owner Steve Smith, and KCIW's program manager Elsie Hulsizer.

Since 1984, Smith Fabrication Inc. has provided precision sheet metal products to leading companies in the fields of aviation, computers, telecom, medical, audio, visual and office furniture manufacturing.

### Emergency notification poster for your use

Did you know that one of the requirements of the permits issued by KCIW is that companies post emergency phone numbers including those of King County, your local fire department, your company's 24-hour corporate contact, and the Washington State Department of Ecology prominently in the work area? KCIW offers free brightly colored 11-by-17 inch posters for this purpose, and sends a poster to each permittee. The poster includes a number of important numbers. *To obtain a free poster, use KCIW contact information on page 1*



## About the Industrial Pretreatment Quarterly

*Published by the Industrial Waste Program, Wastewater Treatment Division, King County Department of Natural Resources and Parks (contact information page one).*

*Editors: Doug Hilderbrand, Dana West*

*Contributors: KCIW staff contributors include Barbara Badger, Denise Healy, Kristin Painter, Doug Hammond, Dana West*

*Photographers: Ned Ahrens, King County Graphic Design and Production Services (KCGD&PS) and Heather Trim (IWAC)*

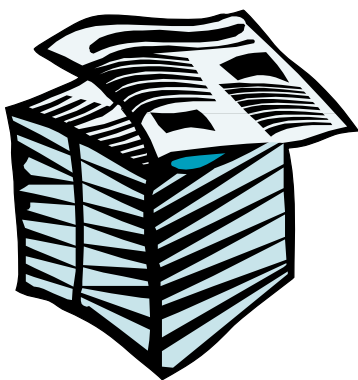
*Layout: Doug Hammond, KCGD&PS*

*Printing: KCGD&PS*

*Distribution: Bibiana Ameh, Kristin Painter*

*Available on the Internet at: <http://dnr.metrokc.gov/wlr/indwaste/publicat.htm>*

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**This material is provided in  
alternative formats upon  
request by calling  
206-263-3000  
or TTY relay: 711**

## Industrial Pretreatment Tips

### Hazardous waste generators

#### "count smart to save"

*KCIW presents these technical assistance tips as cost-effective ways to reduce pollutants and volumes of wastewater discharged into the sewerage system, to protect public health and the environment.*

*The following article appears in the Spring/Summer 2005 issue of the Washington State Department of Ecology's (Ecology) publication Shoptalk.*

Over-counting your dangerous waste can cost you, in money and time, trying to meet requirements that don't apply. Or you may undercount and wind up improperly managing your waste, leaving you open to fines or other enforcement. What should you do?

First, count the weight of all dangerous waste you generate on your site in a month's time. Don't rely on the manifest amount. Manifests show the amount being sent for disposal, not how much you produce in one month.

Once you've established your actual generation amount for the month, look for any rules that reduce or exempt your waste from counting (such as WAC173-303-016, -017 and -071). Ecology designs these exemptions to encourage better, more efficient use and handling of hazardous substances. Any efforts you can make to reduce or eliminate the amount of waste you create (part of pollution prevention) will also reduce or eliminate the costs of handling and disposing of the material.

Some common problems related to counting waste can include:

- Adding the weight of the container holding your dangerous waste.
- Counting only the weight of wastes manifested or shipped off-site. This may be under-counting, since waste treated or recycled on-site must also be counted. Again, check the regulations for anything that may reduce the amount of waste counted when recycled.
- Guessing the weight of liquid waste. If you can, find the actual weight. If you don't have that, multiply the gallons by 8.34 lbs.

*Ecology has two publications online that can help you count accurately. Counting Dangerous Waste Under the Dangerous Waste Regulations, publication #98-414, or Frequently Asked Questions About Recycling Credits, publication #03-04-019. For printed copies, call Ecology's Dave Zink at 360- 407-6752 or e-mail: [Dzin461@ecy.wa.gov](mailto:Dzin461@ecy.wa.gov) or go to <http://www.ecy.wa.gov/biblio/98414.html> on the Internet.*

## 2006 Industrial Waste fees

The article below provides some initial information about how the new EPA "streamlining" rule and resulting possible King County ordinance changes could bring about lower fees over a period of years. Also highlighted are changes the program has made to keep to 2006 Industrial User fees as low as possible.

### 2006 Fees

In recent years the charges paid by companies that KCIW monitors for heavy metals have risen. This

is primarily due to the decrease in the volume of industrial discharges without a corresponding reduction in the number of industrial monitoring samples the program has to collect to meet federal and state monitoring requirements.

The 2006 fees include a significant change in the way KCIW makes year-to-year adjustments. In the past when the program had revenue shortfalls or overruns, due to either additional costs or unexpected changes in volumes discharged, it compensated for those changes by raising or

*(Continued on page 5)*

### Comparison of 2005 and 2006 Fees

	2005 Fees	2006 Fees
<b>High Strength Surcharge</b>		
Biological Oxygen Demand (BOD)	\$0.146536/pound	\$0.179700/pound
Total Suspended Solids (TSS)	\$0.238412/pound	\$0.276082/pound
<b>Monitoring Charges</b>		
Heavy metals	\$0.002662/gallon	\$0.002722/gallon
Fats, Oils and Grease		
\$0.000165/gallon	\$0.000309/gallon	
<b>Permit Fees</b>		
Waste Discharge Permit	\$1,615.00	\$1,620.00
Discharge Authorizations		
Major-New	\$1,545.00	\$910.00
Major-Renewal	\$1,545.00	\$910.00
Minor-New	\$705.00	\$440.00
Minor-Renewal	\$705.00	\$440.00
Letter of Authorization	\$140.00	\$140.00
<b>Post Violation Fees</b>		
Metals Grab	\$145.00	\$150.00
Metals Composite	\$275.00	\$280.00
pH Grab	\$130.00	\$130.00
pH Continuous (Installation)	\$110.00	\$120.00
pH Continuous (Per week of operation)	\$110.00	\$120.00
FOG Set	\$340.00	\$375.00
VOA Grab	\$285.00	\$340.00
VOA Composite	\$415.00	\$470.00
BNA Grab	\$430.00	\$375.00
BNA Composite	\$560.00	\$505.00
Cyanide Grab	\$170.00	\$190.00
Cyanide Composite	\$300.00	\$320.00
Mercury Grab	\$155.00	\$150.00
Mercury Composite	\$290.00	\$280.00
BOD	\$305.00	\$200.00
TSS	\$280.00	\$145.00
Enforcement Action	\$855.00	\$440.00
Inspection	\$180.00	\$235.00



lowering fees in subsequent years. In compiling the 2006 fees KCIW dropped that practice for Heavy Metal and Fats, Oils, and Grease (FOG) fees and instead based its fees solely on its anticipated costs for the coming budget year.

When Metro first adopted the Industrial User (IU) fees, it had a stable industry base of the same companies year after year so the practice of adjusting fees to compensate for past year's revenue changes made sense. But since 2001, a number of metal platers and circuit board shops closed and remaining businesses significantly reduced their volumes. At the same time new types of companies, generally with lower volumes discharged, moved in. The result is that if KCIW continued the practice of compensating for past years' revenue declines, it would be charging current companies for expenses generated by past companies now out of business.

KCIW has taken several additional steps to decrease its operating costs to help reduce fees. For example, in 2005 the program eliminated two staff positions and continued grant-funded work for the Lower Duwamish Waterway Superfund cleanup. It has cancelled its Key Manhole sampling program for 2006, reducing operating costs and saving facilities that pay the heavy metal monitoring charge about \$60,000.

The new federal "Streamlining" amendments profiled on Insert A-D appear to offer the potential for additional cost reductions. KCIW is looking at all aspects of the amendments to find areas where it can reduce operating costs. For instance, one of the amendments allows a reduction in monitoring for pollutants that aren't present. In the past KCIW had to monitor all categorical facilities twice a year for all regulated pollutants. KCIW has already reduced the 2006 monitoring costs for those facilities without Total Toxic Organics in their discharges that the program previously had to monitor twice a year. Instead, the program will now monitor those facilities only once per year for that parameter. Each Volatile Organic Compound sample that the program does not have to collect generates a savings of \$230 in analytical costs.

## About industrial user fees:

The fees charged to IUs for the types of waste they discharge to the sewer system recover approximately 50 percent of the KCIW program budget; the King County sewage-treatment fee pays for the rest.

Each year, KCIW reviews all of the fees. The table below compares 2005 fees with the new ones for 2006. The program's intent is to recover just what it costs to operate the fee programs listed in the table.

The program recovers the costs for treating high-strength wastewater by applying a surcharge to wastes that have a biochemical oxygen demand greater than 300 mg/l and total suspended solids greater than 400 mg/l. The surcharge includes an administrative charge that recovers costs of sampling, analysis, inspection, and billing high-strength dischargers.

KCIW also recovers costs for monitoring discharges for heavy metals and fats, oils, and grease. Charges recover all costs of inspecting and sampling companies with such discharges. Also included are the costs for the program's investigators to review the data and reports submitted by companies.

The post-violation program is designed to recover inspection and monitoring costs from out-of-compliance facilities. Because violating companies require more attention than companies in compliance, post-violation fees put the economic burden on companies that cause the extra costs.

KCIW also recovers costs for inspecting and drafting permits and discharge authorizations.

The unit charges of fees shown on the table (page 4) are affected by several factors, including the following year's predicted expenditures and the previous year's actual expenditures.

*For more information about fees contact KCIW Program Officer Doug Hilderbrand at 206-263-3032 or e-mail [douglas.hilderbrand@metrokc.gov](mailto:douglas.hilderbrand@metrokc.gov) or go to <http://dnr.metrokc.gov/wlr/indwaste/fees.htm> on the Internet.*

## Companies win recognition for helping protect the environment

### Governor's awards announced

Last fall two of the five facilities receiving the 2005 Governor's Award for Pollution Prevention & Sustainable Practices are also regulated by KCIW. The award is the state's highest honor for taking care of the environment while doing business in Washington.

Ball Metal Beverage Container Corp. of Kent was recognized for conserving water, avoiding the use of toxic materials, reducing air emissions and efficiently using materials. Seattle's University of Washington Medical Center was recognized for eliminating the use of a significant toxic chemicals, conserving water and energy, reducing waste, and supporting the regional community. *For more information, visit Ecology's award Web site: [http://www.ecy.wa.gov/sustainability/GovAward/gov\\_awards.htm](http://www.ecy.wa.gov/sustainability/GovAward/gov_awards.htm) on the Internet.*

### Ecology honors companies

In 2005 Ecology honored companies that achieved the most impressive gains as part of the agency's Cleaner Production Challenge. Focusing on electroplaters, printed circuit board manufacturers and aerospace parts manufacturers as typically high-volume water users, the multi-year Challenge project gave the companies access to state-of-the-art manufacturing methods, teaming a number of Washington businesses to share their best techniques. The 19 companies receiving awards generated 156 million gallons less wastewater and 384,000 pounds less sludge during the program.

Award winners that also work with KCIW to protect the environment are: Art Brass Plating, Seattle; Asko Processing Inc., Seattle; Avtech Corp., Seattle; The Boeing Company, Auburn; Eldec Corp., North Creek; Industrial Plating Corp., Seattle; Magnetic & Penetrant Services, Seattle; Prototron Circuits Inc., Redmond; Skills Inc., Seattle; Universal Manufacturing Corp., Woodinville. *For more information on the Cleaner Production Challenge, go to <http://www.ecy.wa.gov/programs/hwtr/p2/CPC.html> on the Internet.*

## November 2 IWAC highlights

*With the goal of protecting the environment, public health, biosolids quality and King County's regional sewerage system, KCIW's Industrial Waste Advisory Committee (IWAC) meets to exchange ideas among representatives of industrial wastewater dischargers, sewer agencies, environmental groups, and KCIW staff. (For upcoming meeting information see page two.)*

**Announcements:** Welcome to new IWAC members Larry Petersen of Mikron Industries and Heather Trim of People for Puget Sound.

**Todd Pacific Shipyards dry dock wastewater activities:** Scott Jackson, chief engineer at Todd Pacific Shipyards spoke about their dockwater collection and treatment system and the challenges they have faced in designing a system that would adequately collect, store, and treat all of the stormwater falling in both the industrial land areas and on the dry docks, as well as the process wastewater, all of which must be discharged to the sanitary sewer. *For more information, contact Scott at 206-623-1635.*

**Countywide Water Supply Plan:** Dave Monthie, regional water policy analyst for the King County Department of Natural Resources and Parks gave a presentation about the countywide Regional Water Supply Plan. The comprehensive plan evaluates alternative sources of supply; lists local governments interested in participating and achieves regional agreement on a forecast for long-term water supply demands. *For more information contact Dave at 206-296-3782 or by e-mail at [dave.monthie@metrokc.gov](mailto:dave.monthie@metrokc.gov).*

**Industrial Waste Strategic Plan:** Greg Newborn, KCIW compliance specialist, presented a draft of KCIW's strategic plan. Major goals are to have a lean operation that saves on fees, continue to be an effective pretreatment program and be prepared to respond to changes in the economy and in our own government system. *For more information contact Greg at 206-263-3022 or by e-mail at [greg.newborn@metrokc.gov](mailto:greg.newborn@metrokc.gov).*

**EPA's final Pretreatment Streamlining Rules:** (See special insert pages A-D for more information.)

(IWAC highlights continued)

**Tour of Todd Pacific Shipyards:** Al Rainsberger, manager of safety/quality and environmental compliance at Todd Pacific Shipyards conducted the tour. Thank you for the hospitality shown by Al and Todd Pacific Shipyards! (For full summary see KCIW Web site, url on page 1.)

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## Publication of recent enforcement actions

King County's Industrial Waste Program is responsible for making sure that water used by county industries returns to our waterways clean and safe. This protects our water resources, our public health, workers at treatment plants, and the biosolids produced there.

Most businesses in King County do an excellent job of meeting this clean water goal by treating their industrial wastewater before they discharge it to the sewer. Whenever possible, we work to provide technical assistance and help industries reach compliance before enforcement actions become necessary. If companies violate clean water standards, however, we do take enforcement actions, as federal regulations require.

The following companies are users of the county sewer system that violated treatment requirements between September and November 2005 (or have not had their violations previously published). They were found in significant noncompliance during the reporting period; received fines; had violations that were unique or warranted special attention; or met a combination of those actions.

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### **Drainage System Consultants**

740 S. Monroe  
Seattle, Washington 98146

**Nature of Violation/ Type of Pollutant:** Failure to file an application for a waste discharge permit within five days of the fine notice's due date.

**Basis for Publication:** A fine.

**Comments:** Drainage System Consultants is being required to file an application for non-permitted discharge.

**Penalty:** \$500 fine (\$100/day for five days).

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### **TFS Electronic Manufacturing Services**

9461 Willows Road N.E.  
Redmond, Washington 98052

**Nature of Violation/ Type of Pollutant:** Failure to file an application for a waste discharge permit within 5 days of the fine notice's due date.

**Basis for Publication:** A fine.

**Comments:** TFS Electronic Manufacturing Services filed the application, and they have been issued a discharge authorization.

**Penalty:** \$500 fine (\$100/day for 5 days).

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**Other Enforcement Actions** King County Industrial Waste also acted on 6 other violations at 6 companies for the following pollutants and/or parameters: late reports (1); nickel (1); lead (1); settleable solids (1); total toxic organics (1); and toluene (1).

We all need to work together to prevent pollution. If you have information for the Industrial Waste Program or questions about our programs, please call 206 263-3032 or 711, TTY Relay Service. You may also visit our program's pages at <http://dnr.metrokc.gov/wlr/indwaste/index.htm> on the Internet.



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## Special Insert: Streamlining Amendment published!

*King County's Wastewater Treatment Division protects public health and water quality by serving 17 cities, 17 sewer districts and more than 1.4 million residents in King, Snohomish and Pierce counties. The regional public utility has been preventing water pollution for nearly 40 years.*

### IWAC tours Todd Pacific Shipyards (page 6)



### Boeing Electronics Center, 2004 Commitment-to-Compliance award winner, 2005 (page 1)

*Left to right: Boeing's James Inman, Supervisor, Shared Services Group Puget Sound WWTP Operators, James Absolor, WWTP Operator, KCIW's Elsie Hulsizer and Dave Dornbush, Site Safety, Health and Environmental Affairs Environmental Engineer.*

Boeing's Integrated Defense Systems' Electronics Center provides quality products and services while maintaining environmental compliance and stewardship.

## Clean Water: A Sound Investment